

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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TEAMSTERS LOCAL UNION NO. 804 and	:	
TEAMSTERS AMAZON NATIONAL	:	
NEGOTIATING COMMITTEE,	:	
	:	Civil Action No. 24-CV-08683 (FB)(TAM)
Plaintiff,	:	
	:	
-against-	:	<b>NOTICE OF MOTION TO</b>
	:	<b>INTERVENE OF AMAZON.COM</b>
	:	<b><u>SERVICES LLC</u></b>
THE CITY OF NEW YORK; NEW YORK	:	
CITY POLICE COMMISSIONER JESSICA	:	
TISCH, <i>in her official capacity</i> ; NEW YORK	:	
CITY MAYOR ERIC ADAMS, <i>in his</i>	:	
<i>official capacity</i> ,	:	
	:	
Defendants.	:	
	:	
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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Amazon.com Services LLC’s Motion to Intervene; Declaration of Glenn Smith, Esq., together with Exhibits A and B; and Declaration of Kelly Dawson; and upon all the pleadings and proceedings herein, Amazon.com Services LLC (“Amazon” or the “Company”), by and through its attorneys, moves this Court for leave to intervene as a defendant in this action as of a matter of right under Rule 24(a)(2) of the Federal Rules of Civil Procedure (“FRCP”), or, alternatively, for permissive intervention pursuant to FRCP 24(b) (hereinafter, the “Motion”). If the Motion is granted, Amazon intends to oppose any motion for preliminary injunction and move for dismissal of the Complaint, in its entirety, on the grounds that Plaintiffs have failed to meet the requirements of FRCP 65 and because this action is moot.

WHEREFORE, Amazon respectfully requests this Court grant it leave to intervene in this action as a defendant, an opportunity to file a Motion to Dismiss the Complaint, an opportunity to oppose any motion for preliminary injunction, and any such other relief as this Court may

deem just and proper.

Dated: New York, New York  
February 6, 2025

Respectfully submitted,  
  
SEYFARTH SHAW LLP

By: /s/ Glenn J. Smith

Glenn J. Smith  
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Attorneys for Intervenor-Defendant  
Amazon.com Services LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on February 6, 2025, the foregoing AMAZON’S MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION TO INTERVENE was served upon counsel of record for Plaintiffs and Defendants via e-mail. Pursuant to Judge Block’s Individual Rules Amazon will electronically file all motion papers via ECF on February 14, 2025.

/s/ Glenn J. Smith  
Glenn J. Smith